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[Proposed] Attorneys for Debtor in Possession

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

LOS ANGELES DIVISION

In re

Treetop Development, LLC,

Debtor

Case No. 2:22-bk-14165

Chapter 11

**[PROPOSED] ORDER APPROVING
APPLICATION OF THE DEBTOR
FOR ENTRY OF AN ORDER
AUTHORIZING RETENTION AND
EMPLOYMENT OF BCLP AS
SUBSTITUTE COUNSEL FOR THE
DEBTOR AND DEBTOR-IN-
POSSESSION EFFECTIVE AS OF
OCTOBER 7, 2022**

*[Filed contemporaneously with Application
for Retention and Statement of
Disinterestedness]*

The Court considered the *Application of the Debtor for Entry of and Order Authorizing Retention and Employment of BCLP as Substitute Counsel for the Debtor and Debtor-In-Possession Effective as of October 7, 2022* (“**Application**”) filed by debtor and debtor-in-possession, Treetop Development, LLC (“**Debtor**”) under 11 U.S.C. § 327(a) to employ Bryan Cave Leighton Paisner LLP (“**BCLP**”) as general bankruptcy and restructuring counsel, as well as the *Statement of Disinterestedness*, the *Declaration of Sharon Z. Weiss*, and other exhibits submitted in support thereof.

1 As no objection has been filed to the Application, and it appearing that BCLP does not
2 hold any interest adverse to the Debtor or the bankruptcy estate and finding that BCLP is a
3 “disinterested person” as defined by 11 U.S.C. § 101(14) and that Debtor’s employment of BCLP
4 is in the best interest of the bankruptcy estate and good cause existing, the Court hereby

5 **ORDERS** as follows:

- 6 1. The Application is APPROVED.
- 7 2. Debtor is authorized to employ BCLP to act as its general bankruptcy and restructuring
8 counsel, the extent, rate and amount of compensation and reimbursement of expenses to
9 be paid as an administrative expense in such amounts as the Court may hereafter allow
10 pursuant to 11 U.S.C. §§ 330 and 331, upon properly submitted application(s) and orders
11 thereon pursuant to the terms of BCLP’s engagement letter, which is attached to the
12 Application at Exhibit 2.
- 13 3. In the event the Debtor is unable to obtain reasonable and appropriate post-petition
14 financing, BCLP shall be permitted to terminate and withdraw from its representation of
15 the Debtor upon reasonable notice and without further order of this Court; provided that
16 the Debtor has first or otherwise obtained substitute counsel.

17 **IT IS SO ORDERED**

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